

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

IN RE:	§	
	§	CASE NO. 21-60280
CORRY DAVIS MARKETING, INC.,	§	
	§	
DEBTOR.	§	
	§	CHAPTER 11
542 East Hwy. 64	§	
Canton, Texas 75103	§	
EIN: xx-xxx8498	§	

**DEBTOR'S APPLICATION TO RETAIN ALLIE BETH ALLMAN & ASSOCIATES AS
REAL ESTATE BROKER FOR DEBTOR-IN-POSSESSION**

Your rights may be affected by the relief sought in this pleading. You should read this pleading carefully and discuss it with your attorney, if you have one in this bankruptcy case. If you oppose the relief sought in this pleading, you must file a written objection, explaining the factual and/or written basis for opposing the relief.

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN FOURTEEN (14) DAYS FROM THE DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION. IF NO OBJECTION IS TIMELY SERVED AND FILED, THIS APPLICATION SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SCHEDULE A HEARING UNLESS IT DETERMINES THAT AN EVIDENTIARY HEARING IS NOT REQUIRED AND THAT THE COURT'S DECISION WOULD NOT BE SIGNIFICANTLY AIDED BY ORAL ARGUMENT. IF YOU FAIL TO APPEAR AT ANY SCHEDULED HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

Corry Davis Marketing, Inc., Debtor herein, makes this Application to Employ Allie Beth Allman & Associates as real estate broker for Debtor-in-Possession and in support thereof respectfully represents as follows:

1. This Application is filed pursuant to Bankruptcy Rule 2014 and Local Rule of

Bankruptcy Procedure 2014. Applicant filed its petition under Chapter 11 of the United States Bankruptcy Code on July 2, 2021.

2. Applicant desires to employ the following real estate firm for the Debtor-in-Possession in this case:

Allie Beth Allman & Associates
c/o Kimberly Ashmore
5015 Tracy Street
Dallas, Texas 75205
(214) 521-7355 phone
kimberlyashmore@gmail.com

3. Applicant desires to employ Allie Beth Allman & Associates as a real estate broker to represent it for the purposes of marketing for sale the real property in Van Zandt County, Texas owned by Applicant.

4. Allie Beth Allman & Associates has provided Applicant pre-petition with real estate brokerage services pursuant to a Listing Agreement executed by Debtor on April 6, 2021 and by Allie Beth Allman & Associates on April 27, 2021.

5. Based upon the declaration attached hereto, Applicant believes that neither Allie Beth Allman & Associates nor any broker or agent affiliated with it is a creditor of the Debtor's estate and is not owed for pre-petition services. Applicant has entered into a pre-petition Listing Agreement with Allie Beth Allman & Associates, a copy of which is attached hereto, and has agreed to pay Allie Beth Allman & Associates a commission of 6% of the purchase price realized from any sale approved by the Court, such commission being subject to the approval of the Court.

6. Applicant seeks approval of the employment of Allie Beth Allman & Associates as real estate broker for Applicant for the purposes set forth above. Applicant

has not employed any other real estate broker pursuant to Court order in this case.

7. Applicant further submits that, to the best of its knowledge and belief, such approval does not impair or prejudice any party in interest.

WHEREFORE, Corry Davis Marketing, Inc., Debtor, prays for an order of this Court approving the employment of Allie Beth Allman & Associates as a real estate broker for the purposes described in Paragraph No. 3 above, with compensation to be paid as administrative expense in such amounts as this Court may hereinafter determine and allow.

DATED: July 20, 2021.

Respectfully submitted,

LAW OFFICES OF MICHAEL E. GAZETTE

By /s/ Michael E. Gazette
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ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Debtor's Application to Employ Allie Beth Allman & Associates as Real Estate Broker for Debtor-in-Possession has been served electronically or has been sent to the parties in interest set forth on the attached mailing matrix via First Class U. S. Postal Service mail on July 20, 2021.

/s/ Michael E. Gazette

Michael E. Gazette

t:corrydavismarketing/employalliebethallman.app